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Buesing Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BUESING CORPORATION, an Arizona
corporation,

Plaintiff,

vs.

HELIX ELECTRIC OF NEVADA, LLC,
a Nevada Limited Liability Company, dba
HELIX ELECTRIC,

Defendants.

Case No. 2:16-cv-01439-JCM-NJK

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE TO
COMPLETE DISCOVERY

[FOURTH REQUEST]

AND RELATED CLAIMS.

Plaintiff/Counter-Defendant Buesing Corporation (“Buesing”) and Defendant/Counterclaimant Helix Electric of Nevada, LLC (“Helix”), by and through their respective counsel, hereby stipulate and agree and further request that the Court extend the deadline to complete discovery for a period of sixty (60) days—from December 15, 2017 to February 13, 2018.

The parties have been diligently prosecuting their claims, have continued to conduct discovery, and recently attended a second mediation, but were unable to resolve the matter at that time. Based on counsel and witnesses’ schedules, the parties need an additional sixty days to complete remaining depositions. The parties do not request that the Court extend any other dates, including the current deadlines to file dispositive motions (January 19, 2018) or to file a Joint Pretrial Order on February 16, 2018. Other than completion of discovery and the briefing of

dispositive motions, the parties anticipate that the matter will be ready for trial after the filing of the Joint Pretrial Order.

This is the fourth request to extend the deadline to complete discovery and is being made within 21 days of the current deadline (December 15, 2017). The parties have had some difficulty in securing dates for a number of the depositions, including the depositions of a number of third party witnesses and former employees. This difficulty was exacerbated by Thanksgiving and the impending holidays. The parties anticipated that they would have a complete deposition schedule by the time they filed this request but were unable to do so in time to file this request 21 days prior to discovery cutoff. Accordingly, they make this request in good faith prior to the deadline passing.

The deadline to be extended, the current deadlines in parenthesis [ECF No. 32], and the proposed new dates, are as follows:

- Discovery cut-off (December 15, 2017) to be February 13, 2018.

Dated this 13th day of December 2017.

Dated this 13th day of December 2017.

DICKINSON WRIGHT PLLC

PARKER, NELSON & ASSOCIATES,
CHTD.

/s/ Eric D. Hone

/s/ Shana D. Weir

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ORDER

IT IS SO ORDERED:


United States Magistrate Judge

DATED: December 14, 2017